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6 UNITED STATES DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA
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9 Jeremy Stanfield, Romonia Persaud, and
10 Shabnam Sheila Dehdashtian, individually, on
behalf of all others similarly situated, and on
behalf of the general public,

11 Plaintiffs,

12 v.

13 First NLC Financial Services, LLC, and
14 DOES 1 through 50 inclusive,

15 Defendants.

16 Case No. C 06-3892 SBA JL
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**STIPULATION AND [PROPOSED]
ORDER CONTINUING PHASE ONE
DISCOVERY CUT-OFF DATE
CIV. L.R. 6-2(a)**

Judge: Hon. Sandra B. Armstrong

Date Action Filed: June 22, 2006

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33 **First NLC Financial Services, LLC**

1 PURSUANT TO LOCAL RULE 6-2(a), Plaintiffs Jeremy Stanfield, *et al.* and
2 Defendant First NLC Financial Services, LLC (collectively, "the parties") stipulate as follows:

3 WHEREAS, the December 21, 2006 Order For Pretrial Preparation sets the Phase
4 One class certification discovery cut-off as April 14, 2007;

5 WHEREAS, the parties have discovered that the original list of putative class
6 members was missing putative class members;

7 WHEREAS, the parties have agreed, upon Court approval, to conduct a second
8 mailing of the Court-approved notice and conduct a second sixty-day opt-in period for individuals
9 missing from the original class list;

10 WHEREAS, the parties stipulate that plaintiffs can amend their complaint to
11 include a fourth job title, Branch Processor;

12 WHEREAS, the parties stipulate that individuals in the Branch Processor title may
13 receive notice of this collective action and have a sixty day period to opt into the class;

14 WHEREAS, the parties have been conducting written and deposition discovery
15 and have several depositions on calendar through March and beginning in April;

16 WHEREAS, the parties stipulate that the Phase One discovery cut-off should be
17 continued to June 12, 2007;

18 WHEREAS, the parties have not sought any other modifications to the schedule
19 for the case; and

20 WHEREAS, the parties' stipulation should not affect the other dates in the Court's
21 Order For Pretrial Preparation;

22 WHEREAS, nothing by this stipulation or any other written or oral agreement by
23 First NLC shall be construed as an admission or a waiver that class certification or a collective
24 action for any of these job positions identified in plaintiffs' complaints or in this case is
25 appropriate;

26 IT IS HEREBY STIPULATED by and between the parties to this action through
27 their designated counsel as follows:

1 The parties respectfully request that this Court modify Paragraph A of the December 21, 2006
2 Order For Pretrial Preparation as follows "All phase one discovery, except for expert discovery,
3 shall be completed and all depositions taken on or before **6/12/07**. The parties are responsible for
4 scheduling discovery so that motions to resolve discovery disputes can be heard before the above
5 discovery cut-off."

6 Dated: March 12, 2007

7 NICHOLS KASTER & ANDERSON, LLP

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9 By: _____ /s/
10 Bryan J. Schwartz
11 Attorneys for Plaintiffs and Representative Plaintiffs

12 Dated: March 12, 2007

13 ORRICK, HERRINGTON & SUTCLIFFE LLP
14 NELSON MULLINS RILEY & SCARBOROUGH
15 LLP

16 By: _____ /s/
17 Michael D. Weil
18 Attorneys for Defendant
19 First NLC Financial Services, LLC

20 ORDER

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22 Dated: 3/15/07

23 
24 Honorable Sandra B. Armstrong
25 United States District Court Judge